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February 20, 2024

Via ECF

Hon. Elizabeth S. Stong
U.S. Bankruptcy Court, EDNY
Conrad B. Duberstein Courthouse
271-C Cadman Plaza East - Suite 1595
Brooklyn, NY 11201-1800

Re: In re 525 Park Williamsburg LLC; Case No. 24-40228-ess

Dear Judge Stong:

This firm is counsel to 525 Park LLC (“Seller”) in connection with the above-referenced chapter 11 case of 525 Park Williamsburg, LLC (the “Debtor”). Further to my recent letter filed on February 16, 2024, this letter is to provide the Court an update of my discussions with Debtor’s counsel regarding the issue of referral of the parties’ dispute to the Court’s mediation program.

I spoke with Ms. Blumenfeld twice yesterday. Much of the conversations consisted of confidential settlement communications. But before the second conversation, my client informed me that the Debtor had served a summons on Seller to appear before a certain rabbinical court to address the parties’ dispute. I advised Ms. Blumenfeld that this unilateral decision by the Debtor to seek to compel litigation of the issues before a rabbinical court of its choice, without consultation with Seller, makes it clear to Seller that mediation is not a viable alternative in this case. To be fair to Ms. Blumenfeld, she advised me that she had not been aware of the summons to rabbinical court. In light of the foregoing, Seller reserves all of its rights.

Respectfully submitted,

RUBIN LLC

By: /s/ Paul A. Rubin
Paul A. Rubin

cc: Rachel Blumenfeld, Esq.